

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

SIERRA CLUB,

Plaintiff,

v.

VIRGINIA ELECTRIC AND POWER
COMPANY d/b/a DOMINION VIRGINIA
POWER,

Defendant.

Civil Action No. 2:15-cv-112-RAJ-DEM

DEFENDANT'S MOTION TO FILE DOCUMENTS UNDER SEAL

Defendant Virginia Electric and Power Company d/b/a Dominion Virginia Power ("Dominion"), by counsel, hereby moves the Court to file under seal the following documents:

- Dominion's Memorandum In Support of Motion *In Limine* To Exclude Certain Irrelevant Evidence, and Exhibits A, C Part One, D, and E, thereto.

In support of this Motion, Dominion submits contemporaneously herewith a nonconfidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order.

Dated: May 27, 2016

Respectfully,

By: /s/ Laura Anne Kuykendall
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*Counsel for Defendant Virginia Electric and Power
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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of May, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which then will send automatic notification of such filing (NEF) to the following:

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